

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Glen A Jones	Debtor(s)	CHAPTER 13
U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSF10 Master Participation Trust	Movant	NO. 23-13696 PMM
vs.		
Glen A Jones	Debtor(s)	
Kenneth E. West	Trustee	11 U.S.C. Section 362

**MOTION OF U.S. BANK TRUST NATIONAL ASSOCIATION, NOT IN ITS
INDIVIDUAL CAPACITY, BUT SOLELY AS TRUSTEE OF LSF10 MASTER
PARTICIPATION TRUST
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

1. Movant is U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSF10 Master Participation Trust.
2. Debtor(s) is the owner(s) of the premises 262 Barbara Lane, Warminster, PA 18974, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$211,000.00 on the mortgaged premises that was executed on November 23, 2010. The mortgage has been assigned as follows:

LSF10 Master Participation Trust to U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSF10 Master Participation Trust assigned dated 2/25/2022; recorded 3/3/2022
4. Kenneth E. West, is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).
6. Debtor(s) has failed to make the monthly post-petition mortgage payments in the amount of \$1,754.17 for the months of January 2024 through March 2024.

7. The total amount necessary to reinstate the loan post-petition is \$5,262.51.
8. Movant is entitled to relief from stay for cause.
9. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Denise Carlon, Esq.

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